

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In re:

Jodell Alteir

Case No: 6:15-bk-1838-KSJ
Chapter 7

Debtor.

/

**RESPONSE IN OPPOSITION TO OBJECTION TO CLAIM OF CREDITOR
MANDALAY AT STONEBRIDGE COMMONS-CLAIM NO.4 (DOC. NO. 94)**

COMES NOW, Creditor, Mandalay at Stonebridge Commons Condominium Association, Inc. ("Creditor"), by and through its undersigned counsel, and hereby files its Response in Opposition to Debtor's, JODELL ALTEIR, ("Debtor"), Objection to Claim of Creditor Mandalay at Stonebridge Commons – Claim no. 4 (Doc. No. 94) ("Objection"), and does state:

1. On July 9, 2015, Creditor filed its Proof of Claim based on a debt owed to Creditor by Debtor under an Indemnification and Hold Harmless Agreement and a Supplement to Indemnification and Hold Harmless Agreement (true and correct copies of the Agreements are attached to Plaintiff's Proof of Claim).
2. On or about May 2, 2016, Debtor apparently filed the Objection seeking to disallow Creditor's Claim based on the allegation that no supporting documentation showing actual amounts paid was attached.
3. Creditor has no record of being served with this Objection by U.S. Mail, Certified Mail, electronic mail or otherwise.
4. As such, Creditor just now became aware of this Objection.

5. Creditor attached an Affidavit to its Proof of Claim from the Creditor's Secretary and Custodian of Records attesting to the amounts paid by Creditor.

6. Creditor can supply additional documentation supporting these payments and will do so at a later date.

7. Creditor is filing this objection now to demonstrate to the Court and all parties that it does not consent to this Objection and seeks to assert its rights in this bankruptcy as to the amounts owing under its Proof of Claim.

WHEREFORE, for the foregoing reasons, Creditor respectfully requests that this Court deny the Objection and grant such other and further relief this Court deems just and proper.

/s/ Frank J. Lacquaniti

John L. Di Masi Florida Bar No.: 0915602
Frank J. Lacquaniti Florida Bar No.: 0026347
LAW OFFICES OF JOHN L. DI MASI, P.A.
801 N. Orange Ave., Suite 500
Orlando, Florida 32801
Ph (407) 839-3383
Primary Email: jdimasi@orlando-law.com

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S. Mail to the following on this 9th day of June, 2016:

Jonathan B. Alper, Esquire
274 Kipling Court
Heathrow, Florida 32746
Counsel to Debtors

Jodell M. Altier
2507 Road Drive
Orlando, Florida 32835

Trustee
Gene T. Chambers
Post Office Box 533987
Orlando, Florida 32853

Trustee's Counsel
Michael A. Nardella
Nardella & Nardella, PLLC
250 East Colonial Drive, Suite 102
Orlando, Florida 32801

U.S. Trustee
Office of the United States Trustee
George C. Young Federal Building
400 West Washington Street, Suite 1100
Orlando, Florida 32801

/s/ Frank J. Lacquaniti
Frank J. Lacquaniti

4841-3511-8642, v. 1